

1 Andrew H. Wilson  
2 WILSON, RYAN & CAMPILONGO  
3 235 Montgomery Street  
4 Suite 450  
5 San Francisco, CA 94104  
6 (415) 391-3900

7 Laurie J. Bartilson  
8 BOWLES & MOXON  
9 6255 Sunset Boulevard  
10 Suite 2000  
11 Los Angeles, CA 90028  
12 (213) 661-4030

13 Attorneys for Plaintiff  
14 CHURCH OF SCIENTOLOGY INTERNATIONAL

RECEIVED  
DEC 02 1993  
HUB LAW OFFICES

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA

16 FOR THE COUNTY OF MARIN

17 CHURCH OF SCIENTOLOGY ) CASE NO. 157 688  
18 INTERNATIONAL, a California not- )  
19 for-profit religious corporation; ) PLAINTIFF'S SEPARATE  
20 ) STATEMENTS OF DOCUMENT  
21 Plaintiff, ) PRODUCTION REQUESTS AT  
22 ) ISSUE  
23 vs. )  
24 ) [FILED CONCURRENTLY WITH  
25 GERALD ARMSTRONG; MICHAEL WALTON; ) PLAINTIFF'S MOTION TO  
26 THE GERALD ARMSTRONG CORPORATION, ) COMPEL PRODUCTION OF  
27 a California for-profit ) DOCUMENTS FROM DEFENDANTS  
28 corporation; Does 1 through 100, ) GERALD ARMSTRONG AND  
inclusive, ) MICHAEL WALTON, FILED UNDER  
SEPARATE COVER]  
Defendants. )  
\_\_\_\_\_ )

21 **SEPARATE STATEMENT CONTAINING REQUESTS FOR THE PRODUCTION OF**  
22 **DOCUMENTS BY DEFENDANT MICHAEL WALTON**

23 (Plaintiff's First Request for Production of Documents)

24 Pursuant to Law and Discovery Manual § 251 et seq.,  
25 plaintiff Church of Scientology International hereby presents its  
26 Separate Statement in support of its concurrently filed motion to  
27 compel production of documents in response to Plaintiff's First  
28 Request for the Production of Documents by Defendant Walton.



1 REQUEST FOR PRODUCTION No. 1:

2 Request for Production 1:

3 All documents relating to the passing of title or conveyance  
4 of the property known as 707 Fawn Drive, San Anselmo, California,  
5 and more particularly described as follows:

6 PARCEL ONE

7 PARCEL TWO as shown upon that certain Parcel Map entitled,  
8 "Parcel Map Lands of California Land Title Portion Lands  
9 described in book 2887 of Official Records, at page 367,  
10 also being Portion of Lots 501 and 501-A unrecorded Map of  
Sleepy Hollow Acres, Vicinity of San Anselmo, Marin County,  
California", filed for record April 8, 1976 in Volume 12 of  
Parcel Maps, at page 43, Marin County Records.

11 EXCEPTING THEREFROM that portion deeded to Alain Pigois and  
12 Nina Pigois husband and wife, as community property, by Deed  
recorded February 27, 1989, Serial No. 89 13373.

13 PARCEL TWO

14 AN EASEMENT for ingress, egress and public utility purpose  
15 described as follows:

16 BEGINNING at a point on the centerline of Fawn Drive, said  
17 point being the most southwesterly corner of Parcel 3, as  
18 upon that certain map entitled, "Parcel Map Lands of  
19 California Land Title Portion page 367, also being a portion  
20 of Lots 501 and 501-A, unrecorded Map of Sleepy Hollow  
21 Acres, Vicinity of San Anselmo, Marin County, California",  
22 filed for record April 9, 1976 in Volume 12 of Parcel Maps,  
23 at page 43, Marin County Records, said point also being the  
24 intersection of the calls "South 26 degrees 20' East 135  
25 feet and North 63 degrees 40' East 20 feet" as contained in  
26 Parcel 2 of the Deed executed by California Land Title  
27 Company, a corporation to Michael C. McGuckin, et ux,  
28 recorded March 26, 1976 in Book 3010 of Official Records, at  
page 190, Marin County Records; thence from said point of  
beginning and along the exterior boundary of said Parcel 3,  
North 63 degrees 40' East 20 feet; thence North 75 degrees  
07' 20" East 164.00 feet; thence leaving said exterior  
boundary of Parcel 3, North 12 degrees 41' East 85.00 feet;  
thence North 30 degrees 45' West 126.00 feet, thence North  
13 degrees 30' East 79.21 feet to the northwesterly boundary  
of Parcel 1, as shown upon that certain map referred to  
hereinabove; then along the exterior boundary of said Parcel  
1, South 84 degrees 00' west 75.70 feet to the most  
Northerly corner of the parcel of land described in the Deed  
executed by Charles B. Robertson, et ux, to Paul Hopkins,  
Jr., et ux, recorded page 623, Marin County Records; then



1 111.7 feet, thence leaving said exterior boundary of Parcel  
2 1, South 18 degrees 45' East 95.06 feet thence South 21  
3 degrees 48' West 70.66 feet; thence South 75 degrees 07' 20"  
4 West 160.00 feet to the certline of Fawn Drive; thence along  
the exterior boundary of said Parcel 3, also being the  
centerline of "Fawn Drive, South 26 degrees 20' East 34.46  
feet to the point of the beginning.

5 (the "PROPERTY"), from the date of acquisition to the present,  
6 including all documents relating to the acquisition of the  
7 PROPERTY. Such documents shall include those relating to any  
8 passing of title or conveyance to you by Gerald Armstrong.

9 Response to Request for Production No. 1:

10 I object to this demand on the grounds that it violates my  
11 constitutional right to privacy; it is irrelevant, vague and  
12 overbroad, burdensome and oppressive, harassive and not  
13 calculated to lead to the discovery of admissible evidence. It  
14 also constitutes discovery prohibited by the Order of the  
15 Superior Court of Los Angeles County, California.

16 Reasons Why Production of Documents is Necessary:

17 The Church has brought this action against Walton and his  
18 co-defendants for fraudulent conveyance of assets belonging to  
19 defendant Gerald Armstrong. This request seeks documents related  
20 to the transfer of real property to Walton by Gerald Armstrong,  
21 for which Armstrong has claimed he received no consideration. The  
22 documents sought by this request are directly related to the  
23 Church's claims against Walton and his co-defendants, and in no  
24 way infringe upon Walton's right to privacy, or that of any other  
25 person.

26 Even were Walton able to assert a reasonable basis for the  
27 claim of privacy as to these documents, that right is not  
28 absolute. Where, as here, the information requested is essential



1 to determining the matters in dispute, the courts must balance  
2 the privacy rights of persons subject to discovery against the  
3 right of civil litigants to discover relevant facts and the  
4 public interest in obtaining just results in litigation. Britt v.  
5 Superior Court (1978) 20 Cal.3d 844, 143 Cal.Rptr. 695; Vinson v.  
6 Superior Court (1987) 43 Cal.3d 833, 842, 239 Cal.Rptr. 292, 299;  
7 Valley Bank v. Superior Court (1975) 15 Cal.3d 652, 125 Cal.Rptr.  
8 553, 555. Even very personal and confidential information may  
9 have to be disclosed if "essential to a fair determination of the  
10 lawsuit." Morales v. Superior Court (1979) 99 Cal.App.3d 283,  
11 160 Cal.Rptr. 194.

12 As shown above, the documents sought by this request are  
13 directly relevant to the Church's claims and are likely to lead  
14 to the discovery of additional admissible evidence. The Church is  
15 entitled to discover facts related to the conveyance of property  
16 from defendant Gerald Armstrong to Walton and his co-defendants.  
17 C.C.P. § 2017(a) provides that a party may obtain discovery

18 [R]egarding any matter, not privileged, that is  
19 relevant to the subject matter involved in the pending  
20 action... if the matter either is itself calculated to  
21 lead to the discovery of admissible evidence. Discovery  
22 may relate to the claim or defense of the party seeking  
23 discovery or any other party to the action.

24 The discovery provisions are interpreted liberally, with all  
25 doubt resolved in favor of permitting discovery. Colonial Life &  
26 Acc. Ins. Co. v. Superior Court (1982) 31 Cal.3d 785, 790, 183  
27 Cal.Rptr. 810, 813, fn. 7-8; Greyhound Corp. v. Superior Court,  
28 364 P.2d 266, 15 Cal.Rptr. 90; Davies v. Superior Court, 36  
Cal.3d 291, 204 Cal.Rptr. 154.

The request is clear and specifically drawn and identifies



1 the subject matter of the requested documents with sufficient  
2 reasonably particularity. The request seeks documents concerning  
3 the transfer of assets from defendant Gerald Armstrong to  
4 defendant Walton. Such a request is neither "overbroad",  
5 "burdensome and oppressive" nor "harassive" when made in the  
6 context of fraudulent conveyance litigation.

7 Finally, no order exists prohibiting discovery in this  
8 action. This Court has already denied not one, but two, attempts  
9 by defendants to stay discovery herein. [Ex. C to Declaration of  
10 Andrew Wilson] The cases pending in Los Angeles are, indeed,  
11 stayed while the Court of Appeal considers Armstrong's appeal of  
12 the preliminary injunction which that Court granted to the  
13 Church. Discovery there, however, has nothing to do with  
14 discovery here. Nothing in any order of the Los Angeles court  
15 can reasonably be construed to prohibit, stay or interfere with  
16 discovery here; at most, the stay in those cases has put  
17 discovery therein on hold.

18 **REQUEST FOR PRODUCTION No. 2:**

19 Request for Production N. 2:

20 All documents evidencing or relating to title of the  
21 PROPERTY or any portion thereof when you first received title to  
22 the PROPERTY.

23 Response to Request For Production No. 2:

24 I object to this demand on the grounds that it violates my  
25 constitutional right to privacy; it is irrelevant, vague and  
26 overbroad, burdensome and oppressive, harassive and not  
27 calculated to lead to the discovery of admissible evidence. It  
28 also constitutes discovery prohibited by the Order of the



1 Superior Court of Los Angeles County, California.

2 Reasons Why Production of Documents Is Necessary:

3 See argument regarding Request No. 1, above.

4 **REQUEST FOR PRODUCTION No. 3:**

5 Request for Production No. 3:

6 All documents evidencing, comprising or relating to  
7 agreements with Gerald Armstrong and/or The Gerald Armstrong  
8 Corporation relating to the PROPERTY including, but not limited  
9 to, agreements of co-ownership and respective amounts of  
10 contribution towards down payment and mortgage payments.

11 Response to Request for Production No. 3:

12 I object to this demand on the grounds that it violates my  
13 constitutional right to privacy; it is irrelevant, vague and  
14 overbroad, burdensome and oppressive, harassive and not  
15 calculated to lead to the discovery of admissible evidence. It  
16 also constitutes discovery prohibited by the Order of the  
17 Superior Court of Los Angeles County, California.

18 Reasons Why Production of Documents is Necessary:

19 See argument regarding Request No. 1, above.

20 **REQUEST FOR PRODUCTION No. 4:**

21 Request for Production No. 4:

22 All documents evidencing, relating to or comprising property  
23 tax bills or property tax statements for the PROPERTY that have  
24 been incurred or received at any time from December 1986 until  
25 the present.

26 Response to Request for Production No. 4:

27 I object to this demand on the grounds that it violates my  
28 constitutional right to privacy; it is irrelevant, vague and



1 overbroad, burdensome and oppressive, harassive and not  
2 calculated to lead to the discovery of admissible evidence. It  
3 also constitutes discovery prohibited by the Order of the  
4 Superior Court of Los Angeles County, California.

5 Reasons Why Production of Documents is Necessary:

6 See argument regarding Request No. 1, above.

7 **REQUEST FOR PRODUCTION No. 5:**

8 Request for Production No. 5:

9 All documents evidencing, comprising or relating to payments  
10 made, including checks or money orders or other documentation of  
11 payments made on the aforementioned property tax bills.

12 Response to Request for Production No. 5:

13 I object to this demand on the grounds that it violates my  
14 constitutional right to privacy; it is irrelevant, vague and  
15 overbroad, burdensome and oppressive, harassive and not  
16 calculated to lead to the discovery of admissible evidence. It  
17 also constitutes discovery prohibited by the Order of the  
18 Superior Court of Los Angeles County, California.

19 Reasons Why Production of Documents is Necessary:

20 See argument regarding Request No. 1, above.

21 **REQUEST FOR PRODUCTION No. 6:**

22 Request for Production No. 6:

23 All documents comprising or relating to any agreement  
24 concerning liens, easements, rights of way, mineral rights, water  
25 rights, leaseholds and any other interest in the PROPERTY.

26 Response to Request for Production No. 6:

27 I object to this demand on the grounds that it violates my  
28 constitutional right to privacy; it is irrelevant, vague and



1 overbroad, burdensome and oppressive, harassive and not  
2 calculated to lead to the discovery of admissible evidence. It  
3 also constitutes discovery prohibited by the Order of the  
4 Superior Court of Los Angeles County, California.

5 Reasons Why Production of Documents is Necessary:

6 See argument regarding Request No. 1, above.

7 **REQUEST FOR PRODUCTION No. 7:**

8 Request for Production No. 7:

9 All documents evidencing, comprising or relating to any  
10 liens, encumbrances, foreclosure actions, whether pending or not,  
11 on the PROPERTY including but not limited to, documents relating  
12 to any payment or partial payment toward a lien, foreclosure  
13 action or other encumbrance.

14 Response to Request for Production No. 7:

15 I object to this demand on the grounds that it violates my  
16 constitutional right to privacy; it is irrelevant, vague and  
17 overbroad, burdensome and oppressive, harassive and not  
18 calculated to lead to the discovery of admissible evidence. It  
19 also constitutes discovery prohibited by the Order of the  
20 Superior Court of Los Angeles County, California.

21 Reasons Why Production of Documents is Necessary:

22 See argument regarding Request No. 1, above.

23 **REQUEST FOR PRODUCTION No. 8:**

24 Request for Production No. 8:

25 All documents, including loan applications, relating to any  
26 loans secured by the PROPERTY at any time from the acquisition of  
27 the PROPERTY by you to the present whether or not said loan(s)  
28 is/are repaid. If said loan(s) is/are repaid, even if you were



1 not the person(s) who repaid it, please provide all documents  
2 relating to said repayment.

3 Response to Request for Production No. 8:

4 I object to this demand on the grounds that it violates my  
5 constitutional right to privacy; it is irrelevant, vague and  
6 overbroad, burdensome and oppressive, harassive and not  
7 calculated to lead to the discovery of admissible evidence. It  
8 also constitutes discovery prohibited by the Order of the  
9 Superior Court of Los Angeles County, California.

10 Reasons Why Production of Documents is Necessary:

11 See argument regarding Request No. 1, above.

12 **REQUEST FOR PRODUCTION No. 9:**

13 Request for Production No. 9:

14 All documents comprising, evidencing or relating to payment  
15 made or other exchange applied for any transfer of title on the  
16 PROPERTY from 1986 until the present. This is to include, but not  
17 be limited to, cancelled checks or receipts.

18 Response to Request for Production No. 9:

19 I object to this demand on the grounds that it violates my  
20 constitutional right to privacy; it is irrelevant, vague and  
21 overbroad, burdensome and oppressive, harassive and not  
22 calculated to lead to the discovery of admissible evidence. It  
23 also constitutes discovery prohibited by the Order of the  
24 Superior Court of Los Angeles County, California.

25 Reasons Why Production of Documents is Necessary:

26 See argument regarding Request No. 1, above.

27 **REQUEST FOR PRODUCTION No. 10:**

28 Request for Production No. 10:



1 All documents comprising, evidencing or reflecting bills or  
2 invoices, and payments thereon, of household maintenance from the  
3 acquisition of any portion of the PROPERTY by you to the present.

4 Response to Request for Production No. 10:

5 I object to this demand on the grounds that it violates my  
6 constitutional right to privacy; it is irrelevant, vague and  
7 overbroad, burdensome and oppressive, harassive and not  
8 calculated to lead to the discovery of admissible evidence. It  
9 also constitutes discovery prohibited by the Order of the  
10 Superior Court of Los Angeles County, California.

11 Reasons Why Production of Documents is Necessary:

12 See argument regarding Request No. 1, above.

13 **REQUEST FOR PRODUCTION OF DOCUMENTS No. 11**

14 Request For Production of Documents No. 11:

15 All documents comprising, evidencing or relating to bills or  
16 invoices, contracts, oral or written, and payments thereon of  
17 subcontractors, materialmen, suppliers or other individuals or  
18 business entities who provided labor, material or supplies for  
19 modification of the PROPERTY at any time from the acquisition of  
20 the PROPERTY by you to the present.

21 Response to Request For Production No. 11:

22 I object to this demand on the grounds that it violates my  
23 constitutional right to privacy; it is irrelevant, vague and  
24 overbroad, burdensome and oppressive, harassive and not  
25 calculated to lead to the discovery of admissible evidence. It  
26 also constitutes discovery prohibited by the Order of the  
27 Superior Court of Los Angeles County, California.

28 Reasons Why Production of Documents Is Necessary:



1 See argument regarding Request No. 1, above.

2 Request For Production of Documents No. 12:

3 All documents comprising, evidencing or relating to payments  
4 to any utility companies for the utilities at the PROPERTY at any  
5 time from the acquisition of the PROPERTY to the present.

6 Response to Request For Production No. 12:

7 I object to this demand on the grounds that it violates my  
8 constitutional right to privacy; it is irrelevant, vague and  
9 overbroad, burdensome and oppressive, harassive and not  
10 calculated to lead to the discovery of admissible evidence. It  
11 also constitutes discovery prohibited by the Order of the  
12 Superior Court of Los Angeles County, California.

13 Reasons Why Production of Documents Is Necessary:

14 See argument regarding Request No. 1, above.

15 Request For Production of Documents No. 13:

16 All documents reflecting the names, addresses and telephone  
17 numbers of all accountants, accounting firms and other persons or  
18 businesses that you retained to manage, analyze, monitor or keep  
19 records of your business and personal financial affairs and  
20 assets, from July 1, 1990 to the present.

21 Response to Request For Production No. 13:

22 I object to this demand on the grounds that it violates my  
23 constitutional right to privacy; it is irrelevant, vague and  
24 overbroad, burdensome and oppressive, harassive and not  
25 calculated to lead to the discovery of admissible evidence. It  
26 also constitutes discovery prohibited by the Order of the  
27 Superior Court of Los Angeles County, California.

28 Reasons Why Production of Documents Is Necessary:



1           In August 1990, defendant Gerald Armstrong transferred real  
2 property, ownership of shares of stock in defendant Gerald  
3 Armstrong Corporation and cash to defendant Walton and his co-  
4 defendants. Armstrong effected these transfers in order to hide  
5 his assets and avoid the consequences of a liquidated damages  
6 clause in Armstrong's 1986 settlement agreement with the Church.

7           This request seeks documents related to the transfer of  
8 assets to Walton by Gerald Armstrong, from which Walton has  
9 benefited and for which Armstrong has claimed he received no  
10 consideration. The documents sought by this request are directly  
11 related to the Church's claims against Walton and his co-  
12 defendants, and in no way infringe upon Walton's right to  
13 privacy, or that of any other person.

14           Even were Walton able to assert a reasonable basis for the  
15 claim of privacy as to these documents, that right is not  
16 absolute. Where, as here, the information requested is essential  
17 to determining the matters in dispute, the courts must balance  
18 the privacy rights of persons subject to discovery against the  
19 right of civil litigants to discover relevant facts and the  
20 public interest in obtaining just results in litigation. Britt v.  
21 Superior Court (1978) 20 Cal.3d 844, 143 Cal.Rptr. 695; Vinson v.  
22 Superior Court (1987) 43 Cal.3d 833, 842, 239 Cal.Rptr. 292, 299;  
23 Valley Bank v. Superior Court (1975) 15 Cal.3d 652, 125 Cal.Rptr.  
24 553, 555. Even very personal and confidential information may  
25 have to be disclosed if "essential to a fair determination of the  
26 lawsuit." Morales v. Superior Court (1979) 99 Cal.App.3d 283,  
27 160 Cal.Rptr. 194.

28           As shown above, the documents sought by this request are



1 directly relevant to the Church's claims and are likely to lead  
2 to the discovery of additional admissible evidence. The Church is  
3 entitled to discover facts related to the conveyance of property  
4 from defendant Gerald Armstrong to Walton and his co-defendants.

5 C.C.P. § 2017(a) provides that a party may obtain discovery

6 [R]egarding any matter, not privileged, that is  
7 relevant to the subject matter involved in the pending  
8 action... if the matter either is itself calculated to  
9 lead to the discovery of admissible evidence. Discovery  
10 may relate to the claim or defense of the party seeking  
11 discovery or any other party to the action.

12 The discovery provisions are interpreted liberally, with all  
13 doubt resolved in favor of permitting discovery. Colonial Life &  
14 Acc. Ins. Co. v. Superior Court (1982) 31 Cal.3d 785, 790, 183  
15 Cal.Rptr. 810, 813, fn. 7-8; Greyhound Corp. v. Superior Court,  
16 364 P.2d 266, 15 Cal.Rptr. 90; Davies v. Superior Court, 36  
17 Cal.3d 291, 204 Cal.Rptr. 154.

18 The request is clear and specifically drawn and identifies  
19 the subject matter of the requested documents with sufficient  
20 reasonably particularity. The request seeks documents concerning  
21 the transfer of assets from defendant Gerald Armstrong to  
22 defendant Walton. Such a request is neither "overbroad",  
23 "burdensome and oppressive" nor "harassive" when made in the  
24 context of fraudulent conveyance litigation.

25 Finally, no order exists prohibiting discovery in this  
26 action. This Court has already denied not one, but two, attempts  
27 by defendants to stay discovery herein. [Ex. C to Declaration of  
28 Andrew Wilson] The cases pending in Los Angeles are, indeed,  
stayed while the Court of Appeal considers Armstrong's appeal of  
the preliminary injunction which that Court granted to the



1 Church. Discovery there, however, has nothing to do with  
2 discovery here. Nothing in any order of the Los Angeles court  
3 can reasonably be construed to prohibit, stay or interfere with  
4 discovery here; at most, the stay in those cases has put  
5 discovery therein on hold.

6 Request For Production of Documents No. 14:

7 All documents reflecting your financial condition from  
8 January 1, 1990 to the present. Such documents shall include but  
9 not be limited to financial statements, asset statements and  
10 balance sheets.

11 Response to Request For Production No. 14:

12 I object to this demand on the grounds that it violates my  
13 constitutional right to privacy; it is irrelevant, vague and  
14 overbroad, burdensome and oppressive, harassive and not  
15 calculated to lead to the discovery of admissible evidence. It  
16 also constitutes discovery prohibited by the Order of the  
17 Superior Court of Los Angeles County, California.

18 Reasons Why Production of Documents Is Necessary:

19 See argument regarding Request No. 13, above.

20 Request For Production of Documents No. 15:

21 All documents reflecting the name, address and telephone  
22 number of the location at which all your business, personal and  
23 banking accounts, including those of the Gerald Armstrong  
24 Corporation, are maintained.

25 Response to Request For Production No. 15:

26 I object to this demand on the grounds that it violates my  
27 constitutional right to privacy; it is irrelevant, vague and  
28 overbroad, burdensome and oppressive, harassive and not



1 calculated to lead to the discovery of admissible evidence. It  
2 also constitutes discovery prohibited by the Order of the  
3 Superior Court of Los Angeles County, California.

4 Reasons Why Production of Documents Is Necessary:

5 See argument regarding Request No. 13, above.

6 Request For Production of Documents No. 16:

7 All documents which refer to, relate to, mention, discuss,  
8 concern or evidence, without limitation, any transfer of cash  
9 and/or shares of stock in the Gerald Armstrong Corporation made  
10 by Gerald Armstrong to you or any person or corporation from July  
11 1, 1990 until the present.

12 Response to Request For Production No. 16:

13 I object to this demand on the grounds that it violates my  
14 constitutional right to privacy; it is irrelevant, vague and  
15 overbroad, burdensome and oppressive, harassive and not  
16 calculated to lead to the discovery of admissible evidence. It  
17 also constitutes discovery prohibited by the Order of the  
18 Superior Court of Los Angeles County, California.

19 Reasons Why Production of Documents Is Necessary:

20 See argument regarding Request No. 13, above.

21 Request For Production of Documents No. 17:

22 All documents which refer to, relate to, mention, discuss,  
23 concern or evidence, without limitation, any property, cash or  
24 other asset paid by you, of any kind whatsoever, in exchange for  
25 every transfer of cash and/or shares of stock in The Gerald  
26 Armstrong Corporation made to you by Gerald Armstrong.

27 Response to Request For Production No. 17:

28 I object to this demand on the grounds that it violates my



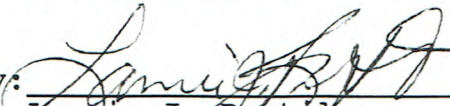
1 constitutional right to privacy; it is irrelevant, vague and  
2 overbroad, burdensome and oppressive, harassive and not  
3 calculated to lead to the discovery of admissible evidence. It  
4 also constitutes discovery prohibited by the Order of the  
5 Superior Court of Los Angeles County, California.

6 Reasons Why Production of Documents Is Necessary:

7 See argument regarding Request No. 13, above.

8 Dated: November 30, 1993

BOWLES & MOXON

9  
10 By:   
11 Laurie J. Bartilson  
12 BOWLES & MOXON

13 Andrew H. Wilson  
14 WILSON, RYAN & CAMPILONGO

15 Attorneys for Plaintiff  
16 Church of Scientology  
17 International  
18  
19  
20  
21  
22  
23

24 H:\Armstron\compsep.1  
25  
26  
27  
28



PROOF OF SERVICE

STATE OF CALIFORNIA            )  
  )    ss.  
COUNTY OF LOS ANGELES        )

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Los Angeles, CA 90028.

On November 30, 1993, I served the foregoing document described as PLAINTIFF'S SEPARATE STATEMENT OF DOCUMENT PRODUCTION REQUESTS AT ISSUE on interested parties in this action,

[ ] by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

[X] by placing [ ] the original [X] true copies thereof in sealed envelopes addressed as follows:

FORD GREENE  
HUB Law Offices  
711 Sir Francis Drake Blvd.  
San Anselmo, CA 94960-1949

MICHAEL WALTON  
707 Fawn Drive  
San Anselmo, CA 94960

GERALD ARMSTRONG  
715 Sir Francis Drake Boulevard  
San Anselmo, CA 94960-1949

THE GERALD ARMSTRONG CORPORATION  
715 Sir Francis Drake Boulevard  
San Anselmo, CA 94960-1949

[X] BY MAIL

[X] \*I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

[ ] As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more



than one day after date of deposit for mailing an affidavit.

Executed on November 30, 1993 at Los Angeles, California.

[ ] **\*\* (BY PERSONAL SERVICE)** I delivered such envelopes by hand to the offices of the addressees.

Executed on \_\_\_\_\_, at Los Angeles, California.

[X] (State) I declare under penalty of the laws of the State of California that the above is true and correct.

[ ] (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Gabriel Becket  
Print or Type Name

Gabriel Becket  
Signature

\* (By Mail, signature must be of person depositing envelope in mail slot, box or bag)

\*\* (For personal service signature must be that of messenger)